



October 22, 2012

United States Environmental Protection Agency - Region 2
DECA - PTSB - Toxic Substances (MS-105)
2890 Woodbridge Avenue (MS-105)
Edison, New Jersey 08837

Attn.: Henry Mazzucca, P.E., Chief

**Re: 11th Quarterly Status Report
PCB Remedial Action
Arsynco, Inc. Site
Carlstadt, New Jersey**

Dear Mr. Mazzucca:

In accordance with Section 5 of the USEPA's *Approval for Risk-Based Clean-up/Disposal of Polychlorinated Biphenyl Remediation Waste* for the Arsynco site, which became effective on July 21, 2009 (the "EPA Approval"), the following provides the 11th Quarterly Status Report for the PCB remedial action at the Arsynco facility.

The following activities/actions have occurred in relation to the site since the last Quarterly Status Report was submitted to EPA on July 10, 2012:

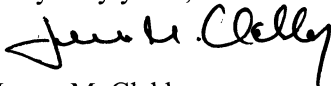
- The majority of the approved pre-excavation, confirmatory PCB grid sampling program was completed from July through the first half of September 2012. Based on the results of some grid samples, additional delineation sampling was required in some areas, and this sampling has continued into October 2012. The results of this extensive grid sampling program will provide detailed confirmation of the areas containing material that requires consolidation or removal (i.e. - it will define the horizontal and vertical boundaries where PCBs are present at concentrations ≥ 50 ppm and ≥ 500 ppm). As proposed, the grid sample locations are being surveyed. The resulting "compliance point" sample locations will be used to predetermine the boundaries of the required excavations in each area and will also serve as final excavation end-point verification samples.
- As noted in the last Quarterly Status Report, on October 31, 2011, Arsynco received a letter from EPA that provided EPA's comments on the financial assurance documents previously submitted by Arsynco. On January 6, 2012, Arsynco submitted an e-mail reply to EPA's letter. The e-mail response was submitted to Ms. Vickie Pane, of EPA, and requested clarification and specificity on EPA's comments to ensure that Arsynco's responses would fully satisfy EPA's requirements. On January 10, 2012, Arsynco submitted a second e-mail to Ms. Pane that provided a signed version of the letter of credit, which addressed one of the comments contained in EPA's October 2011 letter, and again requested a response from EPA clarifying the inquiries stated in the

January 6, 2012 e-mail. As of the date of this letter, no response has been received from EPA on these issues.

The approval of the remaining financial surety issues is critical to allow the PCB remediation program at this site to move forward. Therefore, Arsynco respectfully requests EPA's timely review and response to the remaining financial surety questions.

Should you have any questions or require additional information regarding this matter, please feel free to contact me at (732) 295-2144.

Very truly yours,

A handwritten signature in black ink, appearing to read "James M. Clabby". The signature is fluid and cursive, with the first name "James" and last name "Clabby" clearly distinguishable.

James M. Clabby
President

cc: Vickie Pane, USEPA
Jay Nickerson, NJDEP
Ed Kelly
Douglas Reid-Green
James Dillon
Keith McManus, Esq.
Rusty Norris